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7 **Attorneys for Plaintiff**

8 Japan Corporate News Network K.K.,
 a California Partnership
 9 dba Asia Corporate News Network

10
 11 **UNITED STATES DISTRICT COURT**
 12 **NORTHERN DISTRICT OF CALIFORNIA**

13
 14 **Japan Corporate News Network K.K., a**
 15 California Partnership, dba Asia
 Corporate News Network,

16 Plaintiffs,

17 vs.

18 **ACNNEWSWIRE.COM**, an Internet
 domain name;
 19 **ACNNEWSWIRE.ORG**, an Internet
 domain name;
 20 **ACNNEWSWIRE.NET**, an Internet
 domain name;
 21 **ACN-NEWSWIRE.COM**, an Internet
 domain name; and
 22 **ACN-NEWSWIRE.NET**, an Internet
 domain name,

23 Defendants.

24 Case No. C-07-05061-SI

25
 26 **NOTICE OF SETTLEMENT;
 27 STIPULATED DISMISSAL OF
 28 COMPLAINT AND TRANSFER OF
 DOMAINS; [PROPOSED] ORDER**

1 WHEREAS, on October 1, 2007, Japan Corporate News Network K.K., a
2 California Partnership, dba Asia Corporate News Network ("JCN") filed a Complaint (the
3 "Complaint") against ACNNEWSWIRE.COM, an Internet domain name;
4 ACNNEWSWIRE.ORG, an Internet domain name; ACNNEWSWIRE.NET, an Internet
5 domain name; ACN-NEWSWIRE.COM, an Internet domain name; and ACN-
6 NEWSWIRE.NET, an Internet domain name (collectively, the "ACN Domains");

7 WHEREAS, Timothy Mckinnon ("Mckinnon") is the registrant of record of the ACN
8 Domains;

9 WHEREAS, the Registrar of the ACN Domains, Godaddy.com, Inc., has placed
10 the ACN Domains on Registrar Lock and informed the Court via declaration dated
11 October 3, 2007 that "the Domain Names should be construed to be under the dominion
12 and control of the court until such time as GoDaddy.com, Inc. receives further instruction
13 with regard to the Domain Names";

14 WHEREAS, Mckinnon and JCN have reached a settlement which includes a
15 transfer of the ACN Domains, and a dismissal of the Complaint without prejudice;

16 WHEREAS, Mckinnon and JCN request that the Court give final direction to the
17 Registrar, GoDaddy.com, Inc., as to the dominion and control of the ACN Domains which
18 now reside with the Court;

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1 IT IS HEREBY STIPULATED AND AGREED by and between JCN and Mckinnon
2 that:

3 (1) The ACN Domains shall be transferred to JCN, via its General Partner, Bruce
4 Porter; and,
5 (2) The Complaint shall be dismissed without prejudice.

6
7 DATED: October 23, 2007

8
9 By: 

10 Timothy Mckinnon, Registrant of
11 Record of the ACN Domains

12
13 KRONENBERGER BURGOYNE, LLP
14 150 Post Street, Suite 520
15 San Francisco, CA 94108
16 www.KronenbergerLaw.com

17 DATED: October 23, 2007

18 KRONENBERGER BURGOYNE, LLP

19 By: 

20 Karl S. Kronenberger
Deepa Krishnan
21 Attorneys for Plaintiff, Japan Corporate
22 News Network K.K., a California
23 Partnership, dba Asia Corporate News
24 Network

1 **[PROPOSED] ORDER**

2 Based on the foregoing stipulation, and good cause appearing therefore, **IT IS**
3 **HEREBY ORDERED** that:

4
5 (1) Godaddy.com, Inc. shall unlock the following Domains and transfer them to
6 JCN, via its General Partner, Bruce Porter:

7
8 ACNNEWSWIRE.COM;
9 ACNNEWSWIRE.ORG;
10 ACNNEWSWIRE.NET;
11 ACN-NEWSWIRE.COM;
12 ACN-NEWSWIRE.NET; and,

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14 (2) This Action shall be dismissed without prejudice.

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16
17 **IT IS SO ORDERED.**

18
19 Dated: _____, 2007

20 _____
21 Hon. Susan Illston
22 United States District Judge
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PROOF OF SERVICE

I am a resident of the state of California, over the age of eighteen years and not a party to this action. My business address is 150 Post Street, Suite 520, San Francisco, California, 94108.

On October 23, 2007 I served the following document(s):

**1. NOTICE OF SETTLEMENT; STIPULATED DISMISSAL OF COMPLAINT
AND TRANSFER OF DOMAINS; [PROPOSED] ORDER**

on the parties listed below as follows:

8	Timothy McKinnon
9	PO BOX Q1299
10	Queen Victoria Building
11	Sydney, New South Wales 1230
12	Australia <u>mckint@ecomm.net.au</u> [Courtesy copy]
	Diane E. Whiting
	Domain Services
	Godaddy.com, Inc.
	14455 N. Hayden Rd., Suite 219
	Scottsdale, AZ 85260
	<u>domaindisputes@godaddy.com</u>
	[Courtesy copy]

BY FIRST CLASS MAIL, by placing a true copy thereof in a sealed envelope, with postage thereon fully prepaid, for collection and mailing, in San Francisco, California, following ordinary business practices, which is deposited with the US Postal Service the same day as it is placed for processing.

BY EMAIL to the addresses listed above.

(Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.



Pete Touschner